

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF IOWA

In Re: Robert and Lydia Dixon, Debtor. AmeriCredit and GM Financial, Creditor.	Chapter 7 Bankruptcy No. 20-00013 MOTION FOR AUTHORITY TO REDEEM PERSONAL PROPERTY AND APPROVAL OF ASSOCIATED FINANCING AND ATTORNEY FEES UNDER 11 U.S.C. § 722
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COME NOW the Debtors and in support of the above-captioned Motion states:

1. The item to be redeemed is tangible personal property intended primarily for personal, family or household use is more particularly described as follows:

Year: 2010

Make: Cadillac

Model: STS-V6

VIN # 1G6DU6EV6A0116238

2. The interest of the Debtors in such property is exempt or has been abandoned by the estate and the debt (which is secured by said property to the extent of the allowed secured claim of the Creditor) is a dischargeable consumer debt.
3. The allowed secured claim of said Creditor for purposes of redemption, the "redemption value," should be determined to be not more than \$5,000.00.
4. Arrangements have been made by the Debtors to pay to the said Creditor up to the aforesaid amount in a lump sum should this motion be granted.
5. The payment for this proposed redemption is to be paid in full by the Debtors upon entry of an order approving the above-captioned Motion.

WHEREFORE, the Debtors pray the Court to order AmeriCredit and GM Financial to accept from the Debtors the lump sum payment of the redemption value and release their lien of record. In the event the said Creditor objects to this motion, the Debtors requests

the Court to determine the value of the property as of the time of the hearing on such objection.

MARKS LAW FIRM, P.C.

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NOTICE

Notice is hereby given that unless an objection is made to this motion within 20 days following the date of service below, an order sustaining the motion may be granted by the Court.

United States Bankruptcy Court Southern District of Iowa

In re **Robert C Dixon**
Lydia B Dixon

Debtor(s)

Case No. **20-00013**
Chapter **7**

CERTIFICATE OF SERVICE

I hereby certify that on **January 31, 2020**, a copy of **Motion to Redeem** was served electronically or by regular United States mail to all interested parties, the Trustee and all creditors listed below.

American Accounts & Advisers

AmeriCredit/GM Financial

Capital One

Capital One/Helzberg

CarMax Auto Finance

Comenity Bank/Younkers

Credit Bureau Services of Iowa, Inc.

Credit First National Association

Credit One Bank

Financial Plus Credit

Financial Plus Credit
Fingerhut
First PREMIER Bank
First PREMIER Bank
H & R Accounts, Inc.
Hauge Assoc
IC System, Inc
Internal Revenue Service
Kohls/Capital One
OneMain Financial
Synchrony Bank/ Old Navy
Synchrony Bank/TJX
US Bank/RMS CC

/s/ Samuel Z. Marks

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